

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JONATHAN NNEBE, ALEXANDER
KARMANSKY, EDUARDO AVENAUT,
KHAIRUL AMIN and the NEW YORK TAXI
WORKERS ALLIANCE, individually and on behalf
of all others similarly situated,

06-CV-4991

Plaintiffs,

-Against-

MATTHEW DAUS, CHARLES FRASER, JOSEPH
ECKSTEIN, ELIZABETH BONINA, THE NEW
YORK CITY TAXI AND LIMOUSINE
COMMISSION, AND THE CITY OF NEW YORK,

Defendants.

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ANTHONY STALLWORTH, PARICHAY
BARMAN, NOOR TANI and the NEW YORK
TAXI WORKERS ALLIANCE, individually and on
behalf of all others similarly situated,

Plaintiffs,

17-CV-7119

-Against-

MEERA JOSHI, CHRIS WILSON, STAS SKARBO,
AND THE CITY OF NEW YORK,

Defendants.

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**NOTICE OF MOTION FOR PRELIMINARY
AND PERMANENT INJUNCTIVE RELIEF**

PLEASE TAKE NOTICE that upon the declaration of Daniel L. Ackman dated April __,
2020, the Exhibits thereto, and the accompanying Memorandum of Law, plaintiffs, individually

and on behalf of all others similarly situated, will move this Court, before Hon. Richard J. Sullivan, 500 Pearl St., New York, NY 10007-1312 , at a time to be determined by the Court, for an order pursuant to Rule 65 of the Federal Rules of Civil Procedure and the Court of Appeals Decision and Mandate in these actions granting plaintiffs preliminary and permanent injunctive relief consistent with the decision and mandate and, separately, for an order enjoining summary suspensions on arrest during the Covid-19 pandemic.

Dated: New York, New York
April 9, 2020

/s/ _____
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